

Ecogroup Forest Plan Comments

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Dear Joey:

We appreciate the opportunity to submit comments on the Southwest Ecogroup Draft Environmental Impact Statement and Forest Plans and hope that you find our comments and suggestions constructive and useful.

Desired Future Condition (B-23, Appendices of DEIS)

We found the methods of determining desired future condition (DFC) and the model used for goal programming to be very complicated and difficult to follow. We are particularly leery of computer modeling of natural resource components and systems: most have been fraught with errors, both human and programmatic. Natural deviation for communities as succession progresses is very diverse and not well understood ... particularly for more arid environments. Determining acceptable levels of deviations and subsequent penalties for non-attainment would be extremely difficult and subjective. How were parameters determined?

Capability/Suitability (Chap. 2, page 20, any plan)

We are most concerned with the manner in the Forest Service is both defining and employing rangeland "capability" and "suitability" for livestock grazing. The definitions are absolutely confusing: "Suitable" range has been defined by the Society for Range Management for more than 50 years as "range accessible to livestock and which can be grazed on a sustained yield basis without damage to the resource". The US Forest Service took this definition and termed it "capable" and redefined "suitable" range is as "areas within a capable land base where grazing is appropriate within the context of land management considerations such as...values of the area". This definition would be more appropriately termed "compatible" than suitable. Redefining long established range management terms seems to be an attempt by the Forest Service to separate itself from the range management community. Straying from long held and accepted guidelines promotes instability between agencies and other professional with range management responsibilities.

Second, there is no attempt within the planning documents to define parameters by which to judge either capability or suitability. Capability, using the established guidelines for "suitable range", will be fairly straightforward and easy to apply objectively. There are, however, no definitive guidelines in the planning documents for suitability. Descriptions of criteria briefly mentioned within the planning document will by nature be purely a judgement call and thereby highly subjective. This is unacceptable. Influence by special interest groups or personal bias will be significant. Great pressure will be brought to bear on managers to remove livestock from areas with recreation or of personal interest with no requirement of substantiating evidence. This will not only be unfair to permittees, but will put misplaced pressure on line-officers to make decisions with few guidelines and in a very reactive manner.

Roadless Area Re-evaluation:

Definitions and criteria for roadless area evaluation were unsatisfactory within the DEIS. RARE I and RARE II were referenced but copies are difficult to obtain. Basic definitions and criteria need to be included in the DEIS for reviewers to adequately evaluate decisions described within.

It is unimaginable why tracts of land as small as 389 acres should be managed as Roadless. In these instances, and most others, there are few if any benefits of roadless area designation that sound management practices cannot provide.

In light of the fact that Judge Lodge imposed an injunction on the Roadless Rule, we believe that this portion of the document should be stricken or significantly modified until the legal dispute is resolved.

Wild and Scenic Rivers:

Potential listing of many of the small tributaries mentioned in the forest plans is impractical and not in the spirit of the Wild and Scenic River Act. Many of these streams are small tributaries to major rivers and are under the complete control of the Forests. In the case of tributaries within the SNRA, strict use guidelines already exist and the stream corridors are in no jeopardy of development. Listing them as Wild and Scenic would only bring attention to the area and increase negative impacts.

Riparian and Aquatic Resources-

It is stated that sedges are being replaced by less desirable species due to livestock grazing. This does not make sense in light that most allotments have shown static or upward trends. Language like this is prevalent throughout the documents and casts a hue of anti-grazing.

Standards and Guidelines:

Rangeland Resources:

One of the FS Goals in the Rangeland Resources section proposes standards of 3-inch stubble heights for the most palatable species, and 4 inches for greenline hydric species. According to FS Range Ecologist Al Winward, this stubble height is more than adequate to maintain or improve most riparian areas. Why then is the FS proposing to unilaterally impose 6-inch stubble heights across all management units?

First, it is inappropriate to apply management standards at this administrative level. Secondly there is little scientific support for establishment of stubble heights in this manner. Clary and Leininger (2000) conducted an extensive literature review and could not conclude what minimum stubble height could be appropriately applied across large management units. Unilateral establishment of standards in this manner will greatly reduce the ability of local managers to make site-specific decisions and will stifle initiative for devising new management techniques. With the increased attention given to livestock grazing, some flexibility must be provided to enable managers and permittees to make sensible and necessary changes to annual operating plans.

Rather than applying a standard of 6-inch stubble height across entire management units, we strongly suggest allowing experienced and competent managers the latitude to make site-specific decisions. For riparian areas in Proper Functioning Condition or Functioning-at-Risk and exhibiting upward trends, lower stubble heights are acceptable. If the riparian areas are At-Risk and exhibit a downward trend it may then be appropriate to adjust stubble height standards. The work of Al Winward and others indicate that 3 to 4-inch stubble heights on hydric species, and as

low as 1 to 2- inches on Kentucky bluegrass, were adequate to meet the needs of the plant community, and usually provide needed protection for stream banks (Riparian Symposium, 2001). Winward stressed this would have to be a site-specific decision with consideration of a number of factors.

Unilateral application of stubble height standards, regardless of how conservative, will not guarantee achievement of short or long-term goals or objectives. Trend analysis, which is not even mentioned in any of the plans, must be employed for both riparian and uplands alike if effective management decisions are to be made. Riparian management specialists Wayne Elmore, Al Winward, Steve Leonard, and Wayne Burkhart all agree that direction of trend is more important than short-term standards. These recognized experts in range ecology all believe that the use of short-term monitoring techniques are inappropriate for making long-term determinations, such as carrying capacity or stocking levels.

Using stubble height as a grazing threshold has limited application. Duration and timing of grazing is more important to vegetation health and streambank stability than residual stubble heights. We strongly recommend that the FS modify proposed standards to allow for more locally determined and flexible management requirements to meet specific needs of riparian and upland areas within the management areas.

Each Forest Draft Plan recognizes the role of livestock in reducing risk of wildfire. Using excessive stubble height requirements will nullify benefits of livestock grazing for removing vegetation to lessen fire hazard. Through broad application of the proposed 6-inch stubble height will shorten the length of stay for livestock in most grazing units so that insufficient understory vegetation is removed to reduce risk of wildfire.

Another standard that raises great concerns is that "livestock access and activities will not be allowed if there is direct adverse influence to the reproductive success of ESA listed species, staging adults or incubating eggs." How are effects, positive or negative, on spawning fish determined? Though some fish biologists suspect the presence of livestock may influence staging and spawning behavior, there is no scientific evidence that properly managed livestock activities interfere with spawning activities of staging adult fish. In fact, Ballard and Krueger (1999) reported no difference in the time spawning salmon spent engaged in spawning activities, resting on redds (64%) and under cover (26%), between the grazed and ungrazed areas.

During the two-year study, cattle spent an average of 12% of their time in active spawning redd areas. During the time that redds were observed (2800 cow-days), cattle came in contact <0.01% of the time. Despite the tendency for spawning salmon to retain their eggs if harassed, 100% of the salmon in the study area completed spawning.

Past analysis of potential impacts of livestock grazing on spawning activity has been supposition in lieu of scientific evidence. In future evaluations of the livestock/spawning relationship, we strongly urge the FS to consider the results of this study (copy attached). This is the only scientific study that has directly investigated the influence of the presence of grazing livestock on spawning activities of salmonids. Results of this study do not support the assumption that the mere presence of cattle negatively impacts activities of staging and spawning salmonids.

Lands and Special Uses:

It is critical that the FS recognize the impact land acquisition and exchange has on rural counties in Idaho. Land ownership in Idaho counties, particularly those in Central Idaho, is dominated by federal agencies. In some counties, the percent of federally owned land is as high as 97 percent. The local tax base in these situations is severely limited and more federal acquisition only exacerbates the problem, further burdening the local people. Land sale and exchange should

only be considered if there is no net loss of taxable acreage or if the exchange or acquisition enhances county taxes as well as agency objectives.

Facilities and Road Areas:

We have great reservation about the obliteration of existing roads. The one example of road obliteration in the Slate Creek drainage is not encouraging. The scar from the reclamation can be seen for miles, and inadequate water-barring allows water to be channeled, accelerating velocity, and increasing erosion. A healthy native sagebrush-bunchgrass community exists except where reclamation efforts scarred soil surfaces and allowed non-native annuals and noxious weeds to establish throughout the length of the road. This is but one example.

For those roads that the FS believes are no longer needed, or wishes to close, we urge that retirement activities include adequate drainage, reseeding, *and the use of closure gates* rather than obliteration. Leaving the road intact, but limiting access will protect against accelerated erosion, safeguard wildlife values, and provide for recreational opportunities such as mountain biking, hiking, and horseback riding. Then, if immediate access is required for fire suppression, only minimal repairs will be needed to allow fire crews into the area.

Recreation Resources:

Recreation is an important activity on our national forest and it is important that provision for recreation use be met while minimizing conflicts with other users. However, it is equally important to recognize what truly constitutes genuine conflict as opposed to the cries of special interest groups who simply want to eliminate grazing and other uses to further their own agenda. This will be imperative when using the capability/suitability determinations.

Many visitors to the Forests do so because they enjoy the solitude and flavor of our rural settings. Our rural towns, not yet converted to trendy tourist/second home communities, were originated by and still rely on agriculture, timber, and mining for their primary economy. This piece of the puzzle completes the picture of the West for many. This must be kept in mind while dealing with individuals and groups representing only a small minority of the public, who often try to force their selfish viewpoints on the majority. For example, when the Sawtooth National Recreational Area was created there was congressional direction to maintain the pastoral setting in the Stanley Basin. This was to help maintain local economy as well as preserve a living, visual heritage to SNRA visitors. These opportunities must not be lost in the rush to appease trendy recreational demands.

Thank you for the opportunity to comment.

Sincerely,

Glen Secrist
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